

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

| | | |
|---|---|------------------------------------|
| UNITED STATES OF AMERICA, |) | FILED UNDER SEAL |
| |) | |
| Plaintiff, |) | Cr. No. 21-cr-20005-JTF/tmp |
| |) | |
| vs. |) | |
| |) | |
| BRIAN SUMMERSON and PIERRE WASHINGTON, |) | |
| |) | |
| Defendants. |) | |

MOTION TO SEAL COMPLAINT

Comes now the United States of America, by and through Joseph C. Murphy, Jr., Acting United States Attorney for the Western District of Tennessee, and Dean DeCandia, Assistant United States Attorney, and would respectfully move this Honorable Court to seal the COMPLAINT in this case for the following reasons:

1. The investigation is ongoing;
2. The defendants may flee, conceal evidence or seek to influence persons cooperating with the investigation if they learn of the investigation's existence;
3. Due to the nature of this investigation, investigators believe that the defendants pose a danger to the investigators as well as the community;

Based on the foregoing, the United States respectfully requests that the COMPLAINT be sealed.

WHEREFORE, counsel for the United States respectfully moves this Honorable Court to seal the complaint and order that it remain sealed until further order from the Court.

Respectfully submitted,

JOSEPH C. MURPHY, JR.
Acting United States Attorney

By: s/Dean DeCandia
DEAN DECANDIA
Assistant United States Attorney
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CERTIFICATE OF SERVICE

I, Dean DeCandia, Assistant United States Attorney for the Western District of Tennessee, hereby certify that a copy of the foregoing motion was electronically filed, hand delivered, and/or mailed, first class postage prepaid to the Court.

This 18th day of March, 2021.

By: s/Dean DeCandia
DEAN DECANDIA
Assistant United States Attorney